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October 18, 2019

Hon. Colleen McMahon
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Ricky Rosa*
Docket No.: 18-CR-802

Dear Judge McMahon:

I am CJA counsel to Defendant Ricky Rosa in the above-referenced case. Mr. Rosa's pretrial motions are due today, October 18, 2019.

I write to respectfully request a brief extension of time within which to file Mr. Rosa's pretrial motions to Friday October 25, 2019. Together with the government, we are currently in the process of scheduling with the Magistrate Court a change of plea hearing for Mr. Rosa. We are hoping, subject to the Court's availability, to proceed with the change of plea next Thursday, October 24, 2019. While we do not anticipate any issues with Mr. Rosa's change of plea, out of an abundance of caution, we are respectfully requesting this brief extension of the motion deadline.

I have spoken with the government, by AUSA Dominic Gentile, and they consent to this application.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

cc: AUSA Dominic Gentile
AUSA Aline Flodr